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Arizona Department of Agriculture

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August 3, 2006

Dr. Alan Reynolds Regulatory Action Leader Biopesticides and Pollution Prevention Division (7511C) Office of Pesticide Programs U.S. Environmental Protection Agency 1200 Pennsylvania Avenue NW Washington, DC 20460

Dear Dr. Reynolds:

Along with this cover letter I am submitting additional information in support of two existing special local needs (SLN) registrations for Arizona. The two SLNs are AZ-050009 and AZ-050010. The information being submitted is addressing the conditions as outlined in the Agency's March 27, 2006 letter. This data is the result of the June teleconference between the EPA and the Arizona Cotton Research and Protection Council (ACRPC). There were 5 areas to be addressed. Each of these areas is attached as a separate attachment. Each area is clearly defined by a cover sheet and the pages are numbered for your ease of use.

The attachments are:

- 1) Bt / non-Bt mapping and program management data
- 2) Program pink bollworm trapping and boll sampling data
- 3) Resistance monitoring data from moths collected in pheromone traps
- 4) Resistance monitoring data for 2005 / 2006 larval populations
- 5) Simulation modeling comparing population suppression vs. resistance risk for duration of eradication program

Please contact me or the ACRPC if you have any questions. Thank you for your help.

Sincerely,

Jack Peterson

Associate Director, ESD

cc: (no enclosures) Larry Antilla, ACRPC Rick Lavis, ACGA

Donald Butler, Director